

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
One 2010 Dodge Ram,	:	Civil No.
VIN 1D7RV1GP1AS127823; and	:	
	:	
One 2007 Honda Accord,	:	
VIN 1HGCM66517A040679;	:	
	:	
Defendants.	:	

: : : : : :

VERIFIED COMPLAINT FOR FORFEITURE

Plaintiff, the UNITED STATES OF AMERICA, by its attorneys, Rod Rosenstein, United States Attorney for the District of Maryland, and Stefan D. Cassella, Assistant United States Attorney, brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

NATURE OF THE ACTION

1. This is a civil forfeiture action against properties involved in violations of the Controlled Substances Act that are subject to forfeiture pursuant to 21 U.S.C. §§ 881(a)(4).

THE DEFENDANTS *IN REM*

2. The defendants are one 2010 Dodge Ram, VIN 1D7RV1GP1AS127823, and one 2007 Honda Accord, VIN 1HGCM66517A040679 (the "Defendant Properties"), which were seized on October 8, 2013, from Eric Lavell Skipwith and Chyrie Danay Loudon-Skipwith, and subsequently were placed in the custody of the Drug Enforcement Administration in the District of Maryland where they remain.

JURISDICTION AND VENUE

3. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the Defendant Properties. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, over an action for forfeiture under 28 U.S.C. § 1355(a), and over this particular action under 21 U.S.C. § 881.

4. This court has *in rem* jurisdiction over the Defendant Properties under 28 U.S.C. § 1355(b).

5. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1) because the acts or omissions giving rise to the forfeiture occurred in this district and pursuant to 28 U.S.C. § 1395 because the properties are located in this district.

BASIS FOR FORFEITURE

6. The Defendant Properties are subject to forfeiture pursuant to 21 U.S.C. § 881(a)(4) as a vehicles used, or intended to be used, to transport, or in any manner facilitate the transportation, sale, receipt, possession, or concealment of controlled substances.

FACTS

7. The forfeiture is based upon, but not limited to, the evidence outlined in the attached Declaration of Paul Neikirk, Special Agent of the Drug Enforcement Administration, which is incorporated herein by reference.

WHEREFORE, THE Plaintiff prays as follows:

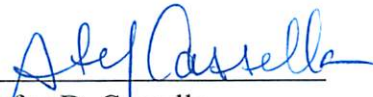
1. That any person or persons having any interest therein be cited to appear herein and answer the Complaint;

2. That a Warrant of Arrest *in rem* issue to the United States Marshal commanding the arrest of the Defendant Properties;
3. That Judgment of Forfeiture be decreed against the Defendant Properties;
4. That upon Final Decree of Forfeiture, the United States Marshal dispose of the Defendant Properties according to law;
5. That the Plaintiff has such other and further relief as the case may require.

Dated: April 4, 2014

Respectfully submitted,

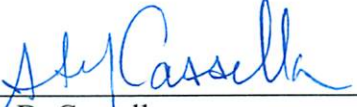
Rod J. Rosenstein
UNITED STATES ATTORNEY
District of Maryland


Stefan D. Cassella
Assistant United States Attorney
36 South Charles Street
Fourth Floor
Baltimore, Maryland 21201
Tel: (410) 209-4800

VERIFICATION

I, Stefan D. Cassella, declare under penalty of perjury as provided by 28 U.S.C. § 1746, that the foregoing Verified Complaint for Forfeiture is based on reports and information furnished to me by the Drug Enforcement Administration and that everything contained therein is true and correct to the best of my knowledge and belief.

Dated: April 4, 2014



Stefan D. Cassella
Assistant U.S. Attorney

DECLARATION

This affidavit is submitted in support of a complaint for forfeiture of one 2010 Dodge Ram, VIN 1D7RV1GP1AS127823, and one 2007 Honda Accord, VIN 1HGCM66517A040679.

I, Paul Neikirk, Special Agent of the Drug Enforcement Administration, submit that there are sufficient facts to support a reasonable belief that the 2010 Dodge Ram and the 2007 Honda Accord constitute vehicles used, or intended to be used, to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of controlled substances in violation of 21 U.S.C. § 841, and thus are subject to forfeiture pursuant to 21 U.S.C. § 881(a)(4).

a. In or around February 2013, members of the Drug Enforcement Administration, the Harford County Task Force, and the Baltimore County Police narcotics unit began an investigation on the drug trafficking activities of Jeremiah Michael Finley ("Finley"), Ronald Dale Lawrence ("Lawrence"), and Eric Lavell Skipwith ("Skipwith").

b. In or around September 2013, investigators initiated court-ordered interceptions of electronic telephone communications of cellular telephones used by Finley, Lawrence, and Skipwith.

c. Surveillance, telephone communication intercepts, and other investigative techniques revealed that Finley and Lawrence obtained controlled dangerous substances, including marijuana and cocaine, from Skipwith as part of an ongoing drug trafficking operation.

d. On October 8, 2013, investigators executed a search and seizure warrant at the residence of Skipwith and his wife, Chyrie Danay Loudon-Skipwith ("Loudon-Skipwith"), located at 408 Northfields Court, Edgewood, Maryland.

e. Pursuant to the execution of the search and seizure warrant at Skipwith's residence, investigators located and seized the following:

1. 700 grams of cocaine;
2. drug paraphernalia;
3. United States currency;
4. miscellaneous documents;
5. one 2010 Dodge Ram, VIN 1D7RV1GP1AS127823; and
6. one 2007 Honda Accord, VIN 1HGCM66517A040679.

f. Skipwith's criminal record includes various controlled dangerous substance charges.

g. A wage and earnings history was conducted for Skipwith and revealed that he had no listed wages or legitimate sources of income.

h. A wage and earnings history was conducted for Loudon-Skipwith and revealed earnings of \$5,230.00 for the 2nd and 3rd quarters of 2011.

i. Tax records for Loudon-Skipwith indicate business income of \$127,464.00 for the year 2010, wage income of \$8,230.00 for the year 2011, and no income reported for the year 2012.

j. Documents seized from Skipwith's residence indicate that Skipwith is involved in Loudon-Skipwith's auto wholesale business as a silent partner to evade law enforcement and uses the business as a front to launder money for the drug trafficking operation.

The 2010 Dodge Ram

k. On September 17, 2013, Skipwith met with a member of the drug trafficking conspiracy while operating the 2010 Dodge Ram, VIN 1D7RV1GP1AS127823.

l. Intercepted telephone communications indicate that Skipwith was conducting drug transactions during this September 17 meeting.

m. On September 26, 2013, Skipwith drove the 2010 Dodge Ram to meet with persons involved in the drug trafficking conspiracy.

n. Intercepted telephone communications indicate that Skipwith was conducting drug transactions during this September 26 meeting.

o. Because Skipwith operated the 2010 Dodge Ram to meet with members of a drug trafficking conspiracy and conduct a drug transaction, it is reasonable to believe that the 2010 Dodge Ram was used to facilitate a drug transaction.

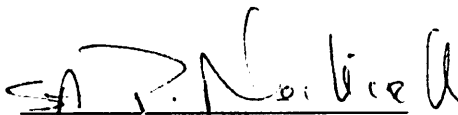
The 2007 Honda Accord

p. On September 13, 2013, Skipwith met with a member of the drug trafficking conspiracy while operating the 2007 Honda Accord, VIN 1HGCM66517A040679.

q. Intercepted telephone communications indicate that Skipwith was conducting drug transactions during this September 13 meeting.

r. Because Skipwith operated the 2007 Honda Accord to meet with members of a drug trafficking conspiracy and conduct a drug transaction, it is reasonable to believe that the 2007 Honda Accord was used to facilitate a drug transaction.

I DECLARE UNDER PENALTY OF PERJURY PURSUANT TO TITLE 28 U.S.C. § 1746 THAT THE FACTS SUBMITTED BY THE HARFORD COUNTY SHERIFF'S OFFICE, IN REFERENCE TO THE SEIZURE OF ONE 2010 DODGE RAM AND ONE 2007 HONDA ACCORD FROM ERIC LAVELL SKIPWITH AND CHYRIE DANAY LOUDON-SKIPWITH ARE ACCURATE, TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

A handwritten signature in black ink, appearing to read "P. Neikirk", written over a horizontal line.

Paul Neikirk
Special Agent
Drug Enforcement Administration

MEMORANDUM

DATE: April 4, 2014

TO: Kristine Cupp
U.S. Marshal Service

FROM: Jennifer Stubbs
Paralegal
U.S. Attorney's Office - District of Maryland

RE: **U.S. v. One 2010 Dodge Ram, VIN 1D7RV1GP1AS127823 and One
2007 Honda Accord, VIN 1HGCM66517A040679**

Civil Action No.

**CATS ID 14-DEA-591806, 14-DEA-591798
Agency Case No. – GC-12-0190**

The United States has filed a forfeiture action against **One 2010 Dodge Ram, VIN 1D7RV1GP1AS127823 and One 2007 Honda Accord, VIN 1HGCM66517A040679**. A copy of the Complaint for Forfeiture is attached.

Notice of this seizure will be published at www.forfeiture.gov pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims.

Thank you.

Attachment

**U.S. Department of Justice
United States Marshals Service**
**PROCESS RECEIPT AND
RETURN**

PLAINTIFF UNITED STATES OF AMERICA	COURT CASE NUMBER
DEFENDANT One 2010 Dodge Ram, VIN 1D7RV1GP1AS127823 and One 2007 Honda Accord, VIN 1HGCM66517A040679	TYPE OF PROCESS Verified Complaint in Rem

**SERVE
AT**

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
GC-12-0190/14-DEA-591806 & 14-DEA-591798

ADDRESS (Street or RFD, Apartment No., City, State, and ZIP Code)

SEND NOTICE OF SERVICE TO REQUESTER AT NAME AND ADDRESS BELOW:

Jennifer Sutbbs, FSA Paralegal
U.S. Attorney's Office
36 S. Charles Street, 4th floor
Baltimore, Maryland 21201

Number of process to be
served with this Form - 285

Number of parties to be
served in this case

Check for service on U.S.A.

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Address, All Telephone Numbers, and Estimated Times Available For Service)

Arrest property. Fill in the date of arrest in this process receipt and return our copy.

Signature of Attorney or other Originator requesting service on behalf of:

TELEPHONE
NUMBER
410-209-4800

DATE

4/4/14

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY - DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated. (Sign only first USM 285 if more than one USM 285 is submitted)	Total Process	District of Origin	District to Serve	Signature of Authorized USMS Deputy or Clerk	Date
	No. _____	No. _____	No. _____		

I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc. at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above (See remarks below).

Name and title of individual served (If not shown above).

☐ A person of suitable age and discretion then residing in the defendant's usual place of abode.

Address (complete only if different than shown above)

Date of Service

Time
am
pm

Signature of U.S. Marshal or Deputy

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount Owed to US Marshal or	Amount or Refund
-------------	--	----------------	---------------	------------------	------------------------------	------------------

REMARKS: